UNITED STATES DISTRICT COURT SOUTHERN DISTRICT OF NEW YORK

19 RECORDINGS LIMITED,

14-CV-1056 (RA)(GWG)

Plaintiff,

V.

DECLARATION OF CHRISTOPHER Y. L. YEUNG

SONY MUSIC ENTERTAINMENT,

Defendant.

ECF CASE

I, CHRISTOPER Y. L. YEUNG, declare under penalty of perjury pursuant to 28 U.S.C. § 1746:

- 1. I am an associate at the law firm of Covington and Burling LLP, counsel for defendant Sony Music Entertainment ("SME"), and am a member in good standing of the bar of New York and this Court. I make this Declaration in support of SME's Motion to Dismiss the Complaint of plaintiff 19 Recordings Ltd. ("19") and to place before the Court documents relevant to this motion.
 - 2. I attach as Exhibit A a true and correct copy of the Complaint.
- 3. I attach as Exhibit B a true and correct copy of an agreement between 19 and the RCA Records Label, dated September 25, 2002, for the Artist Kelly Clarkson.
- 4. I attach as Exhibit C a true and correct copy of an agreement between 19 and the RCA Music Group, dated June 25, 2003, for the Artist Clay Aiken.
- 5. I attach as Exhibit D a true and correct copy of an agreement between 19 and the RCA Music Group, dated 2005, for the Artist Carrie Underwood.
- 6. I attach as Exhibit E a true and correct copy of an agreement between 19 and the RCA Music Group, dated September 25, 2006, for the Artist Chris Daughtry.

- 7. I attach as Exhibit F a true and correct copy of an agreement between 19 and Sony BMG Music Entertainment Nashville, dated December 21, 2006, for the Artist Kellie Pickler.
- 8. I attach as Exhibit G a true and correct copy of an agreement between 19 and Zomba Recording LLC, dated August 15, 2008, for the Artist David Archuleta.
- 9. I attach as Exhibit H a true and correct copy of an agreement between 19 and the RCA Music Group, dated August 15, 2008, for the Artist David Cook.
- 10. I attach as Exhibit I a true and correct copy of an agreement between 19 and RCA/Jive, dated October 30, 2009, for the Artist Jordin Sparks.
- 11. I attach as Exhibit J a true and correct copy of an agreement between 19 and RCA Records, dated August 14, 2012.

I declare under penalty of perjury that the foregoing is true and correct to the best of my knowledge and belief.

Executed on April 25, 2014 in New York, New York.

Christopher Y. If Young